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June 24, 2024

BY ECF

The Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl St # 1040
New York, NY 10007

Re: *United States v. Laura Perryman*, No. 23-CR-0117-DLC

Dear Judge Cote:

We write to respectfully request that the Court enter an Order approving *in forma pauperis* status for Laura Perryman, who does not have the funds to pay for appellate counsel, so that she may receive appointed counsel for her appeal. In support of this motion is a CJA Form 23 that Ms. Perryman has prepared.

On June 17, 2024, this Court sentenced Ms. Perryman to 72 months in prison and entered judgment in this matter. ECF No. 137. We are today filing a notice of appeal in this Court on Ms. Perryman's behalf. We have paid the \$605.00 filing fee on Ms. Perryman's behalf with our funds so she can proceed with her appeal.

We were not retained to represent Ms. Perryman for her direct appeal. We intend to file a motion in the Second Circuit to be relieved as attorney of record and for the Federal Defenders of New York to represent Ms. Perryman on appeal. We have spoken with Barry Liewant, Attorney-in-Charge of the Appeals Unit of the Federal Defenders, and he has indicated that the Federal Defenders would like to be assigned to handle the appeal. We are not aware and Mr. Liewant is not aware of any conflicts that would prevent this assignment. We are moving here for *in forma pauperis* status because we understand we must do so before moving in the Second Circuit to be relieved as attorney of record for the appeal.

Brian Ked.
Denise Cote
6/25/24

Accordingly, we respectfully request that the Court enter an Order approving *in forma pauperis* status for Ms. Perryman so that counsel may be appointed to represent her in the Second Circuit. The Government advises that it takes no position on this request.

Respectfully submitted,

/s/ Derek A. Cohen

Derek A. Cohen

Sean T. Haran

Johnson Lin

Jennifer Berger (admitted pro hac)

Attorneys for Laura Perryman

CC: Counsel for the Government (via ECF)

Barry Liewant (via email)

FINANCIAL AFFIDAVIT

IN THE UNITED STATES DISTRICT COURT COURT OF APPEALS

IN THE CASE OF

United States

v. Laura Perryman

 OTHER (Specify Below)

FOR

AT

LOCATION
NUMBER

PERSON REPRESENTED (Show your full name)

Laura Perryman

CHARGE/OFFENSE (Describe if applicable & check box→)

 Felony Misdemeanor

18 U.S.C. § 1349; 18 U.S.C. §§ 2, 1347

1 Defendant - Adult
 2 Defendant - Juvenile
 3 Appellant
 4 Probation Violator
 5 Supervised Release Violator
 6 Habeas Petitioner
 7 2255 Petitioner
 8 Material Witness
 9 Other (Specify) _____

DOCKET NUMBERS
Magistrate Judge
District Court
23-cr-0117
Court of Appeals

ANSWERS TO QUESTIONS REGARDING ABILITY TO PAY

INCOME & ASSETS	EMPLOYMENT	Do you have a job? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No IF YES, how much do you earn per month? zero Will you still have a job after this arrest? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown	
	PROPERTY	Do you own any of the following, and if so, what is it worth?	
		APPROXIMATE VALUE	DESCRIPTION & AMOUNT OWED
Home	\$ N/A		
Car/Vehicle	\$ N/A		
Boat	\$ N/A		
Stocks/bonds	\$ N/A		
Other property	\$ N/A		
CASH & BANK ACCOUNTS	Do you have any cash, or money in savings or checking accounts? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No IF YES, give the total approximate amount after monthly expenses \$ 0		
OBLIGATIONS, EXPENSES, & DEBTS	How many people do you financially support? self		
	BILLS & DEBTS	MONTHLY EXPENSE	TOTAL DEBT
	Housing	\$ 1371	\$
	Groceries	\$ 400	\$
	Medical expenses	\$ 0	\$
	Utilities	\$ 120	\$
	Credit cards	\$ 566	\$ 18,328.27
	Car/Vehicle	\$ N/A	\$
	Childcare	\$ N/A	\$
	Child support	\$ N/A	\$
	Insurance	\$ N/A	\$
	Loans	\$ N/A	\$
Fines	\$ N/A	\$	
Other	\$ N/A	\$	

I certify under penalty of perjury that the foregoing is true and correct.

Laura Perryman

6/20/2024

SIGNATURE OF DEFENDANT
(OR PERSON SEEKING REPRESENTATION)

Date